'transmission' and 'routing' refer to physical delivery, the phrase 'or other provision of a telecommunications service' goes beyond mere physical delivery." (Emphasis supplied.)

IV. COLLOCATION ISSUES

A. A $1 Sale and Leaseback Requirement Should Be Adopted, and the Availability of Virtual Collocation Preserved.

MFS and MCI agree with ALTS that the Commission should impose a $1 sale and leaseback requirement in its collocation regulations (MFS Petition at 14-15; MCI Petition at 37-38). As each party notes, creation of such a requirement would: (1) fully protect ILECs from any financial risk of investing in collocated equipment; (2) eliminate disputes over the pricing of such equipment.

The only reason offered by the Commission for declining to adopt this proposal was the risk it might implicate the issues that caused the courts to set aside its original physical collocation regime (Expanded Interconnection with Local Telephone Company Facilities, CC Dkt No. 91-141, Second Memorandum Opinion and Order on Reconsideration, 8 FCC Rcd 7341 (1993) at ¶ 607). Now that Section 251(c)(6) has resolved any question as to the Commission's jurisdiction, this proposed rule needs to be implemented immediately.

While the availability of a $1 sale and leaseback provision would further the effectiveness of virtual collocation, LECC proposes that the Commission restrict this option (LECC Petition at 8-9). According to LECC, the only reason for mandating

virtual collocation in addition to physical collocation is that virtual collocation may be "less costly or more efficient than physical collocation" (LECC Petition at 9, quoting the Interconnection Order at ¶ 552). But cost is a critical element in the implementation of effective local competition. The Commission clearly has discretion under the statute to require both physical and virtual collocation in occur to insure the availability of the lower-cost collocation option to interconnectors.

B. Potential Collocation Sites Should be Expanded.

WinStar and MFS request in their petitions that potential collocation sites should include rooftops (WinStar Petition at 1-2), and also include provisioning of cross-connects between different collocated carriers (MFS Petition at 16-17). ALTS agrees with these positions, and requests that they be granted. LECC asserts that: "had the 1996 Act intended to require interconnection between two collocating carriers within an incumbent LEC's central office, such a requirement would have been specifically included in its provisions" (LECC Petition at 7).[2]

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[2] LECC also asserts that: "Because providing collocation at vaults is impractical, LECC requests that the Commission remove such structures from its definition of 'premises' for collocation purposes. Doing so would realistically acknowledge the physical and economic limitations to which incumbent LECs are subject" (LECC Petition at 6). LECC's request is entirely unnecessary given the Commission's recognition that space limitations can preclude collocation at many different facilities (Interconnection Order at ¶ 575).

LECC's position is frivolous. Since the Interconnection Order clearly requires ILECs to provision cross-connects between the same collocated carrier, there is no conceivable statutory or policy reason why it should not do the same for differing carriers. The fundamental policy of encouraging interconnection among different networks, and the pro-competitive benefits of permitting different CLECs to exchange traffic at the same location are clear. It would be absurd to insist that one CLEC would first have to acquire a controlling interest in a second collocated CLEC before a ILEC would be obligated to provide cross-connects between the two.

C. Collocation Equipment Clarification Is Needed.

MFS is clearly correct that the increasingly "blurred line" between switching and multiplexing: "is especially troublesome in the area of digital, packet-based communications (MFS Petition at 11-13). It proposes that the Commission: "determine that equipment used for the routing of digital signals in packet-based networks is 'necessary for interconnection or access to unbundled network elements' if it is used to provide an interface between the incumbent LEC's network or unbundled network elements and the requesting carrier's packet transmission facilities;" (id. at 12).

ALTS supports MFS' request. The proposed definition would provide a appropriate recognition of the inherently different network architecture encompassed by packet switching equipment, while still retaining the Commission's traditional distinction

between switching and multiplexing in more traditional arrangements.

D. Mandatory Relinquishment of Reserved Space for Collocation Is Fully Warranted.

LECC asserts the Commission should retreat from the requirement that space held for future use must be relinquished before denying virtual collocation requests. According to LECC: "Doing so will permit LECs to meet their ongoing universal service and carrier of last resort obligations;" (LECC Petition at 10). But LECC offers no support for its clairvoyant assumption that relinquishment of reserved central office space translates into loss of dial tone for universal service customers. Indeed, since CLECs will gain the ability to become universal service providers, LECC is not even entitled to assume that ILECs will necessarily be the providers of last resort, far less assume that the loss of a particular portion of reserved space in a central office will have any effect on universal service customers.

E. Subcontracting of Work Outside Cages by Interconnectors Should Be Permitted.

LECC contends that interconnectors should not have the right to subcontract for physical collocation facilities: "outside the physical collocation space (the 'cage');" (LECC Petition at 31). LECC offers no explanation for this request, other than a generalized assertion of "potential harm" (id.). Until LECC offers a more concrete description of the harm that would be imposed unless subcontracting is drastically restricted, its

request should be denied.

V. THE COMMISSION SHOULD NOT ADOPT THE VARIOUS POSITIONS PUT FORTH BY UTILITY COMPANIES THAT WOULD GUT SECTION 703 OF THE 1996 ACT, 47 U.S.C. § 224.

A number of electric utility companies have sought reconsideration of the Interconnection Order in so far as it adopted rules relating to pole attachments and telecommunications carriers' use of utilities' conduits, ducts and rights of way. The companies claim, generally, that the Commission overstepped its authority under the Act and misunderstood the nature of electric utilities and the inherent dangers associated with the collocation of telecommunications facilities with electric facilities. As a general matter, the Commission should leave untouched its rather limited rules implementing Section 224.

ALTS addresses many of the individual contentions of the utilities below. As a preliminary matter, however, ALTS notes that in part the utilities complaints are with the statute, not the Commission's rules. In fact the Commission adopted very few rules in this area and left a great deal to the states and private negotiations. The Commission's rules are rather limited and address only very general concerns. The utilities' portrayal of the rules as being overly regulatory and outside the scope of the Act is, frankly, inaccurate.[3]

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[3] But cf. Delmara Power and Light Company at 2:

> "Delmara applauds the Commission's use of general guidelines for accomplishing statutory goals, rather than prescriptive rules, to give utility's

(continued...)

A. If A Utility Is Subject to Section 224, It Must Provide Access to All of Its Poles, Duct, Conduit and Rights of Way.

A number of companies object to the Commission's conclusion that the "use of any utility pole, duct, conduit or right of way for wire communications triggers access to all poles, ducts, conduits and rights of way owned or controlled by the utility, including those that are not currently used for wire communications."[4] These companies argue that "Congress intended the Commission's jurisdiction to be invoked on a pole-by-pole basis, not a system-wide basis"[5] and that the congressional use of the term "used in whole or in part" refers to the use of a single pole.

The problem with the companies' argument is that the "used in whole or in part" language is part of the definition of "utility" contained in Section 224(a)(1). Thus, the language is used to determine which companies are subject to Section 224, not their obligations under Section 224.[6] Once it is determined that a company is a utility to which Section 224 applies generally, Subsection (f)(1) clearly requires the utility to provide access

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[3](...continued)
facilities without the need for regulatory intervention."

[4] Interconnection Order at ¶ 1173.

[5] Florida Power and Light Co., at 39.

[6] Florida Light and Power's argument that previous Congressional actions supports its reading is inapposite because the definition of utility and subsection (f) were added to the law by the '96 Act.

to all its poles, conduit, ducts and rights of way. That section provides:

> "A utility shall provide a cable television system or any telecommunications carrier with nondiscriminatory access to any pole, duct, conduit or right-of-way owned or controlled by it." (Emphasis added.)

Thus, when the definition of utility is read together with subsection (f)(1) it is clear that the Commission's interpretation of the statute is not only a reasonable, but perhaps the only reasonable, reading of the statute.

B. Transmission Facilities Should Not Be Excluded From Section 224.

Several utilities request reconsideration of the Commission's refusal to preclude "transmission facilities" from the facilities to which access is mandated. These companies read "poles, duct, conduit, or rights-of-way" as excluding transmission facilities under the principle of "expressio unius est exclusio alterius." To these companies "poles" refer only to "distribution poles." The Commission should not disturb its conclusion that transmission facilities may be included in the facilities to which access is mandated.

The utilities' analysis of the Act contravenes the purpose of the Act and does not acknowledge the fact that transmission facilities generally use rights-of-way. As the Commission has stated, the purpose of section 224 is to "permit cable operators and telecommunications carriers to "piggyback" along distribution networks owned or controlled by utilities." (Interconnection

Order at ¶ 1185.) And, even if the utilities were correct with respect to the meaning of "poles," telecommunications carriers and cable operators would have rights to the various "rights of way" of the utilities. Thus, the utilities' request that transmission facilities be excluded at all times is clearly inconsistent with the 1996 Act.[7]

C. The Commission Should Not Allow Utilities to Refuse Access Based on Mere Assertions of Unavailable Space.

The utilities object generally to the Commission's "determination that utilities must expand capacity to accommodate requests for access"[8] and its discussion of the use of space reserved for future use. First, it is important to recognize what the Commission did. The Commission, recognizing that each situation is unique, refused to adopt general rules relating to when a utility may, under the statute deny access based upon "insufficient capacity." Rather, the Commission's basic holding was simply that "[b]efore denying access based on a lack of capacity, a utility must explore potential accommodations in good faith with the party seeking access." (Interconnection Order at ¶ 1163.)

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[7] The Commission was conscious of the technical issues involved in access to transmission facilities and noted that access to such facilities may be denied if the utility can support a claim that access should be denied due to safety or reliability concerns. The Commission's action simply denied a blanket exemption from the access requirements for transmission facilities.

[8] Florida Power and Light at 6.

Thus, the Commission has not, as some of the utilities would have one believe, required them to expand facilities in all circumstances. The Commission has simply required utilities to make good faith efforts to accommodate persons seeking access to pole, ducts, conduit, and rights of way. This is entirely proper and consistent with the general requirement that an entity claiming not to be able to provide something required by the Act has the burden of proving its inability.[9]

The utilities object to the Commission's conclusion that a utility must allow use of its reserve space until it has an actual need for the space.[10] Florida Power argues that "[a]s a practical matter, the reservation of capacity must remain within the exclusive authority of the utility, and any reservation of space by a utility should be considered presumptively reasonable." Florida Power and Light at 12. It also argues that allowing carriers to use reserved space until needed for utilities' non-communications needs is impractical because utilities sometimes need their reserve space for emergency

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[9] ALTS notes that Consolidated Edison seeks reconsideration of the Commission's dispute resolution requirements and states that "The burden of justifying the denial of access should be placed on the requesting entity, not the denying entity." ALTS assumes that Con Ed intended to argue that a requesting carrier who has been denied access has the burden of proving that access is reasonable in the particular circumstances. But this would make no sense. The burden must be on the person seeking an exception to a statutory requirement, particularly when that person is in control of the information necessary to a determination of the reasonableness of the exception.

[10] Con Edison at 5. See also Delmara at 5-6; Pacific Gas and Electric at 5-7.

provision of service, not just for ordinary expansion. Although ALTS would have no objection to the Commission allowing a reasonable reserve for emergencies (that would not be used by telecommunications carriers), ALTS strongly supports that Commission's general rule that requires utilities to allow carriers to use reserved space until the utility needs the space. As the Commission recognized, without such a rule, any utility could easily violate the requirement of nondiscriminatory access by simply stating that all of its unused space was held in reserve for its own use. As Delmarva points out "a utility should not be permitted to hoard excess conduit space." (Delmara Petition at 6.)

D. The Provision of Excess Capacity on a Private Carrier Basis Must Not Be Used as a Means of Circumventing the Provisions of Section 224.

UTC and The Telecommunications Association asks that the Commission clarify that the provision of capacity on a private carrier basis does not constitute the offering of a telecommunications service. While ALTS agrees that the 1996 Act did not change the law relating to private carriage set forth by the court in National Association of Regulatory Commissioners v. FCC, 525 F.2d (D.C. Cir. 1976), the Commission must recognize the potential that this creates for a utility to enter a sweetheart deal with only one carrier, which could then tie up the available poles, cables, ducts and rights of way to the disadvantage of all other carriers. The Commission should, at the very least, make clear that all the requirements of Section 224 relating to

nondiscriminatory access to poles, ducts, conduit and rights of way apply to utilities that lease excess capacity on a private carrier basis to other parties.

VI. PROCEDURAL ISSUES

A. Compliance with Effective Rules Is Not Discretionary for ILECS.

It is almost incomprehensible that MFS has had to ask the Commission to clarify that the duty to negotiate in good faith includes a duty to comply with effective Commission orders. That such a duty to comply with valid Commission orders exists barely raises to the level of "hornbook law." Nonetheless, based upon the assertions in the MFS Petition for Partial Reconsideration and Clarification and various problems that other members of ALTS have encountered, ALTS supports the MFS request to include the refusal to comply with effective Commission rules as an explicit violation of the duty to negotiate in good faith. Making this explicit will give the Commission one additional tool with which it can encourage compliance with the 1996 Act.

B. The Commission Should Not Reconsider its Filing Requirement for Existing Agreements, but Should Require That Any Agreement Relevant to a Negotiation or Arbitration Be Produced When Requested.

ALTS supports the Commission's initial decision to require the filing of all pre-existing interconnection agreements with the state Commissions. The language of Section 252(a) compels that such agreements be filed. Even more important, however, is the purpose behind such filing. The Act clearly intends that all interconnection agreements be reasonable and nondiscriminatory.

It is impossible for the States or the Commission to determine the reasonableness or whether a particular agreement is non-discriminatory without knowing what other agreements a particular ILEC has entered into. Thus, the request of the Wisconsin Public Service Commission to rescind that portion of the Interconnection Order that requires such agreements to be filed should be rejected.

At the same time, the ALTS agrees with Wisconsin that an ILEC has a duty to supply pre-Act interconnection agreements as a matter of good faith negotiation. In fact, such a requirement is extremely important to the negotiations that are proceeding today, and ALTS urges the Commission to immediately clarify that refusal to supply such interconnection agreements is a violation of the duty to bargain in good faith. In the alternative, the Commission should accelerate the filing schedule as requested by Comcast/Vanguard (Petition at 19-22) and Cox (Petition at 11-14).

C. The Commission Should Establish Performance Standards and Enforcement Mechanisms.

In its initial and reply comments ALTS urged the Commission to adopt stringent performance standards and enforcement mechanisms. The signing of interconnection agreements will be meaningless if they are not implemented in a timely manner and according to their terms. Therefore the Commission must, as advocated by TCG and Consolidated Communications Telecom Services Inc., adopt some performance standards and enforcement mechanisms.

There are a number of actions that the Commission could take. The following measures will preserve Commission resources while helping to ensure that the local competition envisioned by the 1996 Act becomes a reality. At the least, the Commission should:

- Amend rule 51.301 to state that it is a violation of the duty to negotiate in good faith if an ILEC refuses to be subject to reasonable commercial enforcement mechanisms, including, but not limited to, mandatory arbitration, specified damages, penalties for failure to perform, or agreed-upon performance standards

- The Commission should adopt a rule that nondiscriminatory rates, terms and conditions includes non-discriminatory provisioning, installation intervals, mean time to repair, and other performance criteria. The ILECs must give CLECs at least as favorable treatment in these areas as it gives to itself.

- As advocated by TCG, the Commission should require some sort of reporting by the major ILECs relating to the provisioning of service to itself and its own entities and to competitors.

D. Cost Support Should Not be Required of New Entrants.

ALTS agrees with MCI that there appears to be an inadvertent error in Rule 51.301(c)(8)(ii). There is absolutely no reason to require competitive providers of service to provide data about its costs. The Commission should modify the Rule, as apparently was intended in the Order to read as follows:

> "(ii) refusal by an incumbent LEC to furnish cost data that would be relevant to setting rates if the parties were in arbitration."

E. Section 252 Agreements should be Defined as Broadly as Possible.

ALTS agrees with the principle articulated by MCI that the Commission should give the broadest possible interpretation to the "interconnection agreements" to which the nondiscrimination requirements of the Act. All interconnecting carriers should be able to obtain any service or element "offered either through tariffs or by any other means that establish the rates, terms and conditions for local interconnection, local resale, and purchases of unbundled networks." MCI Petition at 43.

F. The Request by the Local Exchange Carrier Coalition Relating to Bona Fide Request Process Should be Denied.

The Local Exchange Carrier Coalition requests that the Commission adopt "additional guidelines" for requests made by competitive carriers for interconnection. (LECC Petition at 19-22). LECC expresses concern that CLECs will make frivolous or speculative requests for interconnection and specifically requests that the Commission require requesting parties to provide demand forecasts for the services to be interconnected and to commit to take service for the amount of time necessary to recover the cost of interconnection.

LECC's requests should be denied. First, LECC points to no evidence that any CLEC has made frivolous or speculative requests for interconnection. Even if there were some such requests, which considering the cost and effort it takes to come to agreement is highly unlikely, the LECC request is overly broad and anticompetitive. First, of course, the actual cost of

provisioning the various interconnection arrangements will be recovered by the ILECs, and thus it is unlikely that, even if a competitive carrier is unable to continue in business, that the ILEC will have significant unrecovered costs. Second there is absolutely no need to provide demand forecasts. This is clearly an attempt by the incumbent LECs to obtain a "sneak preview" of a competitive carrier's marketing and business plans.
The LECC request should be denied.

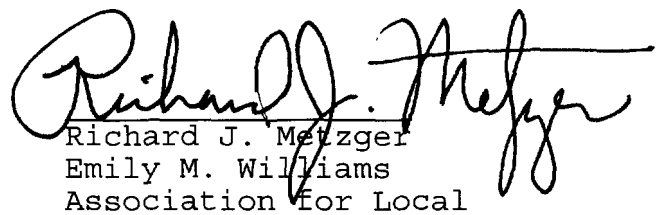
G. The Commission Should Not Adopt Wisconsin's Suggestion That All Section 208 Complaints Be Stayed by the FCC Pending Completion of Negotiations and Arbitrations.

The Wisconsin PUC asks that the Commission stay all Section 208 complaint proceedings pending the completion of negotiations and arbitrations. The Commission should not adopt such a procedure. While it may make sense to stay individual complaints, it would make no sense for the Commission to deny itself a remedy that may be appropriate in some circumstances. In any event, ALTS is unaware of any Section 208 complaints at this time, so that the Wisconsin request is clearly premature and finds a problem where there may be none.

CONCLUSION

For the foregoing reasons, ALTS requests that the petitions for clarification and reconsideration be granted in the manner discussed above.

Respectfully submitted,



Richard J. Metzger
Emily M. Williams
Association for Local
Telecommunications Services
1200 19th St., N.W., Suite 560
Washington, D.C. 20036
(202) 466-3046

October 31, 1996

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Reply to Petitions for Clarification and Reconsideration by the Association for Local Telecommunications Services was served October 31, 1996, on the following persons by First-Class Mail or by hand service, as indicated.

M. Louise Banzon

BELL ATLANTIC NYNEX MOBILE, INC.
John T. Scott, III
CROWELL & MORING
1001 Pennsylvania Ave.,N.W.
Washington, D.C. 20004

Mitchell F. Brecher
Steven N. Teplitz
Fleischman and Walsh, L.L.P.
1400 Sixteenth Street, N.W.
Washington, DC 20036

Regina Keeney*
Chief,Common Carrier Bureau
FCC, Room 500
1919 M Street, N.W.
Washington, D.C. 20554

A. Richard Metzger*
Deputy Bureau Chief
Common Carrier Bureau
FCC, Room 500
1919 M Street, N.W.
Washington, D.C. 20554

Larry Atlas*
Associate Bureau Chief
Common Carrier Bureau
FCC, Room 500
1919 M Street, N.W.
Washington, D.C. 20554

ITS*
2100 M Street, N.W.
Washington, D.C. 20554

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
KELLER AND HECKMAN
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

Rachel J. Rothstein
Danny E. Adams
CABLE & WIRELESS, INC.
KELLEY DRYE & WARREN LLP
8219 Leesburg Pike
Vienna, Virginia 22182

Richard Rubin
Steven N. Teplitz
Fleischman and Walsh, L.L.P.
1400 Sixteenth Street, N.W.
Suite 600
Washington, DC 20036

Daniel Mitchell
Asst. Atty. Gen.
Reg. Industries Division
Public Protection Bureau
200 Portland Str.,4th Floor
Boston, MA 02114

Thomas E. Taylor
Atty. for Cincinnati Bell
Telephone Co.
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

Vincent Majkowski,
Commissioner
Colorado Public Utilities
Commission
1580 Logan Street
Office Level 2
Denver, CO 80203

Andy Lipman
SWIDLER & BERLIN, CHTD.
3000 K Street, N.W.
Suite 300
Washington, D. C. 20007

Joseph M. Sandri, Jr.
WINSTAR COMMUNICATIONS, INC.
1146 19th Street, N.W.
Washington, D.C. 20036

Kyle Dixon
HOGAN & HARTSON L.L.P.
Attorney for LDDS WorldCom
555 Thirteenth Street, N.W.
Washington, D.C. 20004

Charles H. Kennedy
MORRISON & FOERSTER, LLP
2000 Pennsylvania Ave., N.W.
Suite 5500
Washington, D.C. 20006

Colleen A. Sechrest
Philip L. Malet
STEPTOE & JOHNSON LLP
1330 Connecticut Ave., N.W.
Washington, DC 20036

WILLKIE FARR & GALLAGHER
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

MARGARET E. GARBER
Atty for Pactel
1275 Pennsylvania Ave.,N.W.
Washington, D.C. 20004

Antoinette Cook Bush
Skadden, Arps, Slate,
Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005

Mike Pabian
Ameritech
30 South Wacker Drive
Chicago, IL 60606

Saul Fisher
William J. Balcerski
NYNEX
1111 Westchester Avenue
White Plains, NY 10604

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
SPRINT
1850 M Street, N.W.
Washington, D.C. 20036

Maureen O. Helmer
General Counsel
Public Service Commission
of the State of New York
Three Empire State Plaza
Albany, New York 12223

Jonathan Chambers
Vice Pres.of Public Affairs
Sprint Spectrum
1801 K Street, N.W.
Suite M-112
Washington, D.C. 20036

Anne P. Schelle
VP- External Affairs
American PCS, L.P.
6901 Rockledge Dr.
Suite 600
Bethesda, Maryland 20817

Lydia Pulley
James G. Pachulski
Attorneys for Bell Atlantic
1320 North Court House Road
8th Floor
Arlington, VA 22201

Robert B. McKenna
Kathryn Marie Krause
Attorneys for US WEST, Inc.
Suite 700
1020 19th Street, N.W.
Washington, DC 20036

Donald J. Russell
Chief
Telecom. Task Force
Department of Justice
Antitrust Division
555 4th Street, Room 8104
Washington, D.C. 20001

Andrew S. Joskow
Chief
Economic Regulatory Section
U.S.Deparment of Justice
Antitrust Division
555 4th Street, Room 8104
Washington, D.C. 20001

John H. O'Neill, Jr.
Shaw Pittman Potts &
Trowbridge
2300 N Str., NW
Washington, DC 20037-1128

Sean A. Stokes
UTC
1140 Connecticut Ave., NW
Ste. 1140
Washington, DC 20036

Shirley S. Fujimoto
McDermott, Will & Emery
1850 K Str., NW, Ste 500
Washington, DC 20006

David L. Swanson
Edison Electric Institute
701 Pennsylvania Ave
Washington, DC 20004

Shirley A. Woo
Pacific Gas & Electric Co.
Po Box 7442
San Francisco, CA 94120

Dale G. Stoodley
Joanne M. Scanlon
Delmarva Power & Light Co.
800 King Street, PO Box 231
Wilmington, DE 19899

Mary L. Krayeske
Consolidated Edison Co.
Of New York, Inc.
4 Irving Place- Rm 1815S
New York, NY 10003

Jonathan Jacob Nadler
Squire, Sanders & Dempsey
1201 Pennsylvania Ave, NW
PO Box 407
Washington, DC 20044

Ellyn Crutcher
Consolidated Communications
Telecom Services Inc.
121 South 17th Str.
Mattoon, IL 61938

Michael S. Varda
Public Svc. Commission of
Wisconsin
Po Box 7854
Madison, WI 53707-7854

Lana Meller
James Baller
Attorneys for American
Public Power Assoc.
1820 Jefferson Pl, N.W.
Ste. 200
Washington, DC 20036

Leonard Kennedy
Dow, Lohnes & Albertson,PLLC
1200 New Hampshire Ave., NW
Ste 800
Washington, DC 20036

Daniel L. Brenner
Neal M. Goldberg
NCTA
1724 Massachusetts Ave., NW
Washington, DC 20036

Werner K. Hartenberger
Cox Communications, Inc.
Dow, Lohnes & Alberton, PLLC
1200 New Hampshire Ave., NW
Ste. 800
Washington, DC 20036

Chairman Pat Wood, III
Commr. Robert W. Gee
Commr. Judy Walsh
PUC of Texas
7800 Shoal Creek Blvd.
Austin, TX 78757